

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

IGOR VAKSMAN,  
a/k/a "Jay Jenovich,"

Defendant.

Filed 09/05/2007 Page 1 of 4

U.S. DISTRICT COURT  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: SEP 05 2007  
DATE FILED: SEP 05 2007  
INDICTMENT

07 Cr. \_\_\_\_\_

07 CRIM. 838

COUNT ONE

The Grand Jury charges:

1. From in or about June 1997, up to and including in or about August 2004, in the Southern District of New York and elsewhere, IGOR VAKSMAN, a/k/a "Jay Jenovich," the defendant, and others known and unknown, unlawfully, wilfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Sections 1341 and 1347 of Title 18, United States Code.

2. It was a part and an object of the conspiracy that IGOR VAKSMAN, a/k/a "Jay Jenovich," the defendant, and others known and unknown, unlawfully, wilfully, and knowingly, and having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to do, would and did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and would and did knowingly

JUDGE KRAMER

cause to be delivered by mail according to the direction thereon, and at the place at which it is directed to be delivered by the person to whom it is addressed, such matter and thing, in violation of Title 18, United States Code, Section 1341.

3. It was a further part and object of the conspiracy that IGOR VAKSMAN, a/k/a "Jay Jenovich," the defendant, and others known and unknown, unlawfully, wilfully and knowingly would and did execute, and attempt to execute, a scheme and artifice to defraud health care benefit programs, as defined in Title 18, United States Code, Section 24(b), and to obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, health care benefit programs, in connection with the delivery of and payment for health care benefits, items and services, in violation of Title 18, United States Code, Section 1347.

OVERT ACTS

4. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about January 2000, IGOR VAKSMAN, a/k/a "Jay Jenovich," the defendant, recruited other individuals to participate in a staged auto accident in Brooklyn, New York.

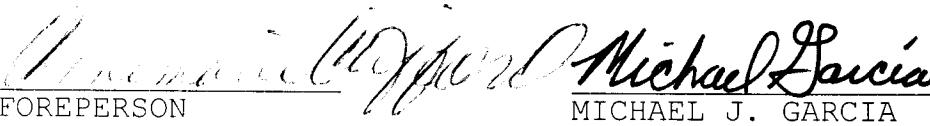
b. On or about August 6, 2004, a law firm located in Manhattan sent a letter to an insurance company located in Atlanta, Georgia, relating to a claim arising from a

January 28, 2000 staged auto accident that was arranged by IGOR VAKSMAN, a/k/a "Jay Jenovich," the defendant, among others.

c. On or about January 10, 2007, VAKSMAN spoke on the telephone with a co-conspirator not named herein ("CC-1") about payments that VAKSMAN owed CC-1 from prior staged accidents.

(Title 18, United States Code, Section 1349.)

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES OF AMERICA

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INDICTMENT

07 Cr.

(Title 18, United States Code, Section  
1349.)

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MICHAEL J. GARCIA  
United States Attorney.

A TRUE BILL

  
Michael J. Garcia  
Foreperson.

Post-It 11/1/87

9/5/07 - Filed Indictment. Case assigned to  
Judge Bram for all purposes.  
  
Michael J. Garcia, U.S. M.J.